## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

SECURITIES AND EXCHANGE COMMISSION,	§	
	§	
Plaintiff,	§	
	§	
<b>v.</b>	§	Case No.: 4:14-CV-02345
	§	
ANDREW I. FARMER,	§	
CHARLES E. GROB, JR.,	§	
CAROLYN AUSTIN,	§	
BALDEMAR P. RIOS, and	§	
CHIMERA ENERGY CORP.	§	
	§	
Defendants.	§	
	§	

## APPENDIX IN SUPPORT OF PLAINTIFF'S STATEMENT OF UNDISPUTED FACTS

The Securities and Exchange Commission submits the attached appendix in support of Plaintiff's Statement of Undisputed Facts. The appendix contains:

2. Exhibit B: Deposition Excerpts of: Andrew I. Farmer Charles Grob David Loev Baldemar P. Rios Fernando Flores Avila Carmina Moreno Sanchez Thomas Massey	00004

3.	Exhibit C:	Press Releases	App. 000099
4.	Exhibit D:	Declarations of: Tyson Rohde Anna Farmer Eddie Austin, Jr. Carolyn Austin Daniel SoRelle	App. 000141

## Mark Dillon John Brotherton

5.	Exhibit E: JP Morgan Chase Bank Records	App. 000166
6.	Exhibit F: Wells Fargo Bank Records	App. 000256
7.	Exhibit G: Defendant Farmer's Responses to Plaintiff's First Requests for Admissions	App. 000280
8.	Exhibit H: Certificate Authorizing Oak Resources to open brokerage account at Merrimac Securities	App. 000294
9.	Exhibit I: Merrimac Trading Authorization	App. 000296
10.	Exhibit J: Chimera Articles of Incorporation	App. 000298
11.	Exhibit K: Promissory Note	App. 000300
12.	Exhibit L: Chimera S- 1 Registration Statement – Oct. 19, 2011	App. 000305
13.	Exhibit M: Chimera 10Q – April 13, 2012	App. 000371
14.	Exhibit N: Email from Farmer dated Sept. 28, 2011	App. 000382
15.	Exhibit O: Email from Farmer dated Oct. 18, 2011	App. 000386
16.	Exhibit P: Email chain from Farmer dated Nov. 17, 2011	App. 000398
17.	Exhibit Q: Email chain from Farmer dated Dec. 5, 2011	App. 000393
18.	Exhibit R: Email chain from Love dated Dec. 12, 2011	App. 000395
19.	Exhibit S: Email chain from Tyson Rohde dated Dec. 22, 2011	App. 000397
20.	Exhibit T: Chimera Subscription Agreements	App. 000399
21.	Exhibit U: Email chain from Eddie Austin dated Jun 20, 2013	App. 000499
22.	Exhibit V: Email chain from Eddie Austin dated Jun 20, 2013	App. 000501
23.	Exhibit W: Email chain from Eddie Austin dated Jun 20, 2013	App. 000505
24.	Exhibit X: Email chain from Eddie Austin dated Jun 20, 2013	App. 000508

25. Exhibit Y: Email chain from Eddie Austin dated Jun 20, 2013	App. 000510
26. Exhibit Z: SEC Release No. 34-41110	App. 000512
27. Exhibit AA: SEC Release No. 34-39670	App. 000569
28. Exhibit BB: FINRA Rule 6432	App. 000604
29. Exhibit CC: NASD Notice to Members 00-49	App. 000607
30. Exhibit DD: NASD Notice to Members 92-50	App. 000612
31. Exhibit EE: FINRA Form 211	App. 000620
32. Exhibit FF: Email from Farmer dated Dec. 22, 2011	App. 000628
33. Exhibit GG: Email chain from Farmer dated Jan. 13, 2012	App. 000630
34. Exhibit HH: Email chain from Eddie Austin dated Jun 20, 2013	App. 000637-A
35. Exhibit II: Pennaluna & Company transmittal letter and Application dated Jan. 24, 2012	App. 000638-A
36. Exhibit JJ: FINRA letter finding application deficient	App. 000648
37. Exhibit KK: Email chain from Grob dated Feb. 3, 2012	App. 000650
38. Exhibit LL: Pennaluna & Company response to FINRA RE: deficiency dated Feb. 6, 2012	App. 000659
39. Exhibit MM: FINRA reply Pennaluna dated Mar 12, 2012	App. 000667
40. Exhibit NN: Email from Farmer dated Mar 13, 2012	App. 000670
41. Exhibit OO: Chimera letter to Pennaluna dated Mar 14, 2012	App. 000675
42. Exhibit PP: FINRA letter dated Apr 10, 2012	App. 000678
43. Exhibit QQ: Iridium Capital Ltd. correspondence regarding IPO investors	App. 000680
44. Exhibit RR: Chartered Investments Inc. correspondence dated May 12, 2012	App. 000685

App. 000687
App. 000689
App. 000691
App. 000694-A
App. 000704
App. 000715
App. 000720
App. 000733
App. 000739
App. 000743
App. 000802
App. 000813
App. 000822
App. 000828
App. 000828 App. 000832

61. Exhibit DDD: American Express credit card record	App. 000836
62. Exhibit EEE: Dow Jones advertising placement order	App. 000838
63. Exhibit FFF: Scottsdale Capital Advisors trade blotter	App. 000848
64. Exhibit GGG: Scottsdale Capital Advisors wire transfer request form	App. 000851
65. Exhibit HHH: Merrimax Corp Securities trade blotter	App. 000856
66. Exhibit III: Pennaluna trade blotter	App. 000859
67. Exhibit JJJ: Oak Resources brokerage account transfer records	App. 000867
68. Exhibit KKK: Marshall Islands Entities transactions	App. 000871
69. Exhibit LLL: Marshall Islands Entities transactions	App. 000873
70. Exhibit MMM: Yurovskaya Due Diligence Questionnaire	App. 000875
71. Exhibit NNN: Kylemore Trust Document	App. 000881
72. Exhibit OOO: Kylemore Corp Articles of Incorporation	App. 000888
73. Exhibit PPP: Account opening documents at CBH for Kylemore Corp	App. 000890
74. Exhibit QQQ: Tikhonova account opening forms	App. 000893
75. Exhibit RRR: Hillsmere Trust	App. 000898
76. Exhibit SSS: Hillsmere Articles of Incorporation	App. 000904
77. Exhibit TTT: Tikhonova background questionnaire	App. 000907
78. Exhibit UUU: Tikhonova Due Diligence Questionnaire	App. 000910
79. Exhibit VVV: Yurovskaya Due Diligence Questionnaire	App. 000912

80. Exhibit WWW: American Express credit card record	App. 000914
81. Exhibit XXX: Email chain from Farmer dated Mar 13, 2012	App. 000916
82. Exhibit YYY: Email from Farmer dated July 27, 2012	App. 000918
83. Exhibit ZZZ: Email chain from Eddie Austin dated July 21, 2012	App. 000926
84. Exhibit AAAA: Email chain from Hannah Loev dated August 10, 2012	App. 000930
85. Exhibit BBBB: McKay document dated Aug 15, 2012	App. 000936
86. Exhibit CCCC: Master credit agreement between Infinite And Chimera dated Aug 15, 2012	App. 000954
87. Exhibit DDDD: Email chain from Thomas Massey dated Aug 20, 2012	App. 000967
88. Exhibit EEEE: Email chain from Farmer dated Aug 24, 2012	App. 000970
89. Exhibit FFFF: So-called Memorandum of Understanding dates Aug 7, 2012	d App. 000973
90. Exhibit GGGG: Email chain from David Loev dated Aug 28, 2012	App. 000976
91. Exhibit HHHH: Email chain from Farmer dated Aug 28, 2012	App. 000982
92. Exhibit IIII: Email from Thomas Massey dated Sept 17, 2012	App. 000989
93. Exhibit JJJJ: Email chain from Grob dated Sept. 26, 2012	App. 000992
94. Exhibit KKKK: Email chain from David Loev dated Oct 2, 2012	App. 001000

App. 001005
App. 001022
App. 001026
App. 001030
App. 001039
App. 001042
App. 001048
App. 001063
App. 001072-A
App. 001077
App. 001103

Dated: August 14, 2015 Respectfully submitted,

s/Matthew J. Gulde

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Attorneys for Plaintiff

## **CERTIFICATE OF SERVICE**

I hereby certify that on August 14, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of the filing to all counsel who have registered with the Court. Additionally, I have caused a true copy thereof to be delivered by the United States Postal Service, Certified Mail, Return Receipt Requested, addressed to:

Chimera Energy Corp. c/o Nevada Secretary of State Meyers Annex Office, Attn: Alfie Frieser 202 N. Carson Street Carson City, Nevada 89701 Defendant

> <u>s/Matthew J. Gulde</u> Matthew J. Gulde